

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA**VS.****CHRISTOPHER RYDBERG (3)**

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Case No. 3:17-CR-155-L

**CHRISTOPHER RYDBERG'S
WITNESS LIST**

Pursuant to Rule 16.1(B) of the Local Rules for the Northern District of Texas and the Scheduling Order entered by the Court, Defendant Christopher Rydberg submits the following list of witnesses that may be used in his defense at trial. Mr. Rydberg adopts all government and co-defendant witness lists filed in this case, subject to and without waiving challenges to admissibility. Mr. Rydberg reserves the right to supplement or amend this witness list, subject to rulings of the Court or submissions of the parties.

NAME		LIKELIHOOD
Bachman, Judy	Bachman will testify to general pharmacy operations and interactions with employees and interactions with Rydberg.	possible
Clifford, Philip	Clifford will testify to his efforts to enter an agreement with Bandoola.	possible
Crocker, Gerry	Crocker will testify to Rydberg's job responsibilities and office dynamics.	possible
Davis, Randy	Davis will testify to his involvement with JR Dallas and his interactions with Robbie Jossa and Rydberg.	possible
Guadian, Amoret "Mona"	Guadian will testify to general pharmacy operations and interactions with employees and interactions with Rydberg.	possible
Imtiyazuddin, Mohammed	Imtiyazuddin will testify about his work as an accountant, tax records, his interaction with Rydberg, and Rydberg's personal taxes.	possible

Marines, Megan	Marines will testify to general pharmacy operations and interactions with employees and interactions with Rydberg.	possible
Paprskar, Elsa	Paprskar will testify about Rydberg's role in the office, the office culture, and her interactions with Rydberg.	possible
Ritter, Robert	Ritter will testify about being a pharmacist, his involvement with the pharmacies, his interactions with Rydberg, instructions to Rydberg, and Rydberg's role in the office.	possible
Rydberg, Chris	RESERVED	possible
Sager, James D.	Sager will testify about Rydberg's property management responsibilities and the work Rydberg performed related to that.	possible
Van Gieson, Robert "Hump"	Van Gieson will testify about Rydberg's property management responsibilities and the work they did together, Rydberg's responsibilities in the office, and Rydberg's involvement with the pharmacies.	possible
Zamanian, Hossein	Zamanian will testify about tax records and about Rydberg's involvement in tax preparation.	possible
Porter, Cliff	Porter will testify as a fact witness regarding bank records involved in the case.	possible
Gerald Ellis McLeod	McLeod will testify about Rydberg's education, work history, and background.	possible
Leyla Nourian	Nourian will testify about real estate, loan, and investment activities.	possible
Jamie Allen	Allen will testify about the financials she created for Ability.	possible

August 14, 2023

Respectfully submitted,

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ATTORNEYS FOR

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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2023, a true and correct copy of this document was served on all counsel of record pursuant to the Federal Rules of Criminal Procedure.

By: /s/ Andrew O. Wirmani